

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

EXPEDITORS INTERNATIONAL OF
WASHINGTON, INC., a Washington
corporation,

Plaintiff,

v.

JOHN DOE,

Defendant.

NO.

COMPLAINT

JURY DEMAND

For its Complaint, Expeditors International of Washington, Inc. alleges as follows:

I. PARTIES

1. Plaintiff Expeditors International of Washington, Inc. (“Expeditors”) is a Washington corporation, with its principal place of business in Bellevue, Washington.

2. Defendant John Doe (“Defendant”) is an individual whose identity is unknown to Expeditors, but who, on information and belief, is a resident of Massachusetts or Georgia, and is not a resident of Washington.

II. JURISDICTION AND VENUE

3. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1332 because there is diversity of citizenship between the parties and the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

4. On information and belief, this Court has specific personal jurisdiction over Defendant because he has purposefully directed his activities to the State of Washington and this judicial district, Expeditors' claims herein arise out of or relate to Defendant's forum-related activities, and the exercise of such jurisdiction is reasonable.

5. Venue is proper in this district in accordance with 28 U.S.C. § 1391(b)(2).

III. FACT ALLEGATIONS

6. Expeditors is a global logistics and freight-forwarding company headquartered in Bellevue, Washington.

7. Beginning in or about December 2024, Defendant began a campaign of sending repeated and anonymous emails concerning and harassing Expeditors to hundreds of persons and entities, including Expeditors' customers and potential customers, Expeditors' employees and family members, and major media organizations across the country (the "Blast Emails").

8. Defendant sent, and continues to send, the Blast Emails from two primary email addresses: (a) secure.report.500@proton.me and (b) EI.Return.Requested@proton.me. Email utilizing the proton.me domain is provided by Proton AG, a Swiss company that extols its privacy features and end-to-end encryption. See <https://proton.me/>

9. The anonymous Blast Emails—which have titillating subject lines such as "*Expeditors International: A Corporate Scandal and Systematic Playbook Exposed*" and "*Unmasking Corruption: Why Expeditors Is No Longer Fit For Business*"—make all manner of false, defamatory, and disparaging assertions regarding Expeditors, as well as its management and employees, some of whom are identified by name and effectively doxed, *i.e.*, their email and mobile phone numbers are published.

1 10. Since December 2024, and continuing to the present, Defendant has sent
2 numerous anonymous Blast Emails from the above-identified proton.me email accounts.

3 **IV. CAUSES OF ACTION**

4 **A. Commercial Disparagement / Defamation**

5 11. Expeditors realleges and incorporates by reference the allegations of Paragraphs
6 1 – 10 above.

7 12. By and through the anonymous Blast Emails, Defendant has made multiple and
8 repeated false representations regarding, among other things, Expeditors' management and its
9 Board of Directors, Expeditors hiring and retention policies and its general employment
10 practices, Expeditors' communications with and billings to customers, and Expeditors'
11 accounting practices and finances.

12 13. Defendant has intentionally communicated these false statements without
13 privilege to hundreds of third parties, *i.e.*, the recipients of the Blast Emails, including dozens
14 of media organizations.

15 14. Defendant knew and knows the statements are false and would create a false
16 impression and harm to Expeditors.

17 15. As a result, Defendant has caused Expeditors damage to its business and
18 reputation in an amount to be proved at trial.

19 **B. Intentional Interference With Contract And/Or Business Expectancy.**

20 16. Expeditors realleges and incorporates by reference the allegations of Paragraphs
21 1 – 15 above.

22 17. Expeditors has valid contractual relationships or business expectancies with
23 many customers or potential customers.

24 18. Defendant had knowledge of those contractual relationships and/or business
25 expectancies.
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